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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

November 9, 2000

**VIA COURIER**

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Centennial Puerto Rico Operations Corp.  
E-911 Phase II Implementation Plan, CC Docket No. 94-102**

Dear Ms. Salas:

Enclosed for filing on behalf of Centennial Puerto Rico Operations Corp. are an original and four copies of its Phase II E-911 Advance Report. Please direct any questions about this submission to the undersigned.

Sincerely,

*James F. Ireland (by cec)*  
James F. Ireland

Enclosure

cc: International Transcription Service (w/encl. on diskette)

Pat Forster (w/ encl.)

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## Centennial Puerto Rico Operations Corp. - Phase II E911 Report NOV 9 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**Background/Contact Information**

- (1) **Carrier Identifying Information:** Centennial Puerto Rico Operations Corp.  
TRS No. 811030
- (2) **Contact Information:** Mr. Luis Carpena  
Director  
Wireline Engineering and Planning Dept.  
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**E911 Phase II Location Technology Information**

- (1) **Type of Technology:** Centennial will adopt the hybrid solution proposed by Lucent Technologies (*FINDS Position Determination Equipment* (PDE)).
- (2) **Testing and Verification:** Centennial has not yet conducted any tests of Phase II technology. Centennial will advise the Commission of its plans to test and verify once they have been developed. According to Lucent, on Prototype trials performed under both stationary and driving scenarios on urban, suburban and rural environments, the FINDS PDE exceeded the FCC mandate. Lucent provided the following test results summary for the EFLT Suburban Field Test.:

Location accuracy obtained, with no change at all to the system, under normal T<sub>add</sub>/T<sub>drop</sub> = -13/-15db:

# BS Visible	% of Samples	% < 125 m	67 percentile	RMS Value	Method(s)	System requirements
3	53.0				FLT	Software at BS/MS needs to be enhanced to combine the information in PSMM and RTD wrt GPS time, and send it back to MSC.
2	32.4	35% overall	230 m overall	261 m overall	FLT+RTD	
1	14.6				RTD+FLAOA	

- (3) **Implementation Details and Schedule:** Centennial is currently examining the specific hardware and software changes that will be necessary and has not yet developed a schedule for such changes. Lucent has provided us with the following General Availability (GA) dates for the different phases of the E911 Phase II:

**FINDS PDE 1.0 (GA 6/01)**

*Network Feature for FINDS:* J-STD-036 CDMA interface to FINDS for locating E911 calls

*FINDS PDE:* Supports E911 Phase II Mandate for IS-801 mobiles

FINDS PDE 1.5 (GA 9/01)

*Network Feature upgrade:* Standards compliant to locate mobile-initiated non-E911 calls (standards dependent); Standards compliant to locate legacy mobiles (standards dependent)

*FINDS PDE upgrade:* Supports E911 Phase II Mandate for IS-801 mobiles; Supports mobile-initiated non-E911 location requests for both IS-801 mobiles and Legacy mobiles.

FINDS PDE 2.0 (GA 12/01)

*Network Feature Upgrade:* Standards compliant to locate network-initiated location requests (Standards dependent); Idle mode location (Standards dependent); Tracking (Standards dependent)

*FINDS PDE upgrade:* Supports E911 Phase II Mandate for IS-801 mobiles; Supports mobile-initiated non-E911 location requests for IS-801 mobiles and Legacy mobiles; Supports network-initiated mobile location requests, idle-mode location, and tracking.

- (4) **PSAP Interface:** Hardware and software changes will be necessary to interface with the PSAPs. However, Centennial does not yet have details of the existing PSAP facilities and is therefore unable to describe the extent of such changes. Centennial will incorporate the required industry standards in accordance with FCC requirements.
- (5) **Existing Handsets:** Centennial's plan for the replacement of customer handsets has not yet been developed since it will depend on the specific technology we ultimately adopt as well as other factors, including cost, associated with replacements.
- (6) **Location of Non-Compatible Handsets:** Centennial currently has over 100,000 handsets that are not ALI compatible and is currently considering the various factors associated with replacing and/or upgrading such handsets.
- (7) **Other Information:** Centennial has not received any requests from the 911 Services or the Puerto Rico Telecommunications Regulatory Board for implementation of Phase II of E911.